

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION
SERVICE CHANGES, 2011

Docket No. N2012-1

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO NATIONAL POSTAL MAIL HANDLERS UNION INTERROGATORIES
REDIRECTED FROM WITNESS DAVID WILLIAMS
(NPMHU/USPS-T1-22 AND 23)**

The United States Postal Service hereby files responses to the above-listed interrogatories of the National Postal Mail Handlers Union dated February 24, 2012. Each interrogatory is stated verbatim and followed by the response. The interrogatories have been redirected from witness Williams to the Postal Service for institutional responses.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO NATIONAL POSTAL MAIL HANDLERS UNION INTERROGATORY
REDIRECTED FROM WITNESS WILLIAMS**

NPMHU/ USPS-T1-22 Please identify any and all steps that the Postal Service intends to take prior to May 15, 2012, in order to prepare for the planned consolidations, including in your answer the anticipated date or time frame in which the Postal Service intends to take each step, including, for instance: (a) reprogramming of processing machines to expand the processing window; (b) moving equipment from losing facilities to gaining facilities; (c) selling or decommissioning excess equipment; (d) issuing excessing notices to employees; (e) renegotiating HCR contracts for transporting mail in the redesigned network; and (f) negotiating or entering into contracts to operate hub or cross-dock transfer stations.

RESPONSE

The question appears to assume the possibility that the Postal Service intends to simultaneously implement all of operational changes associated with the service changes under review in this docket. That is not the case. Although the service standard changes are expected to have a common effective date, implementation of all of the mail processing operational changes will be a much more protracted undertaking over the course of at least a year. The pace of implementation -- from initiation to full-up status -- will vary on a site-by-site basis. The activities listed in the interrogatory will be undertaken on a case-by-case basis to address network-related issues or as specific local operational consolidations are implemented. The sale of excess equipment in many cases may not occur until after consolidations are implemented. It is the intent of the Postal Service to inform potentially affected employees of operational and/or personnel decisions that affect them in accordance advance notice requirements reflected in applicable personnel policies and collective bargaining agreements.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO NATIONAL POSTAL MAIL HANDLERS UNION INTERROGATORY
REDIRECTED FROM WITNESS WILLIAMS**

NPMHU/ USPS-T1-23 Please identify any and all steps that the Postal Service intends to take after May 15, 2012, in order to prepare for the planned consolidations, including in your answer the anticipated date or time frame in which the Postal Service intends to take each step, including, for instance: (a) reprogramming of processing machines to expand the processing window; (b) moving equipment from losing facilities to gaining facilities; (c) selling or decommissioning excess equipment; (d) issuing excessing notices to employees; (e) renegotiating HCR contracts for transporting mail in the redesigned network; and (f) negotiating or entering into contracts to operate hub or cross-dock transfer stations.

RESPONSE

See the response to NPMHU/USPS-T1-22.